

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN**

**UNITED STATES OF AMERICA**

**v.**

**THOMAS BITTER,**

**Defendants.**

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**SUPERSEDING INDICTMENT**

**CRIMINAL NO. 3:16CR00030**

*18 U.S.C. §§ 115 (a)(1)(B)*

*and (b)(4)*

*18 U.S.C. § 875(c)*

*18 U.S.C. § 2261A(2)(B)*

**THE GRAND JURY CHARGES:**

**COUNT ONE**

On or about May 3, 2016, through on or about June 15, 2016, at St. Thomas, in the District of the Virgin Islands, the defendant,

**THOMAS BITTER,**

did threaten to assault and murder A.S., a Judicial Security Inspector, with the intent to impede, intimidate, and interfere with A.S. while engaged in and on account of the performance of his official duties and with the intent to retaliate against him on account of the performance of his official duties.

In violation of Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4).

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U.S.A. v. Thomas Bitter  
Superseding Indictment  
Page 2

**THE GRAND JURY FURTHER CHARGES:**

**COUNT TWO**

On or about May 3, 2016, through on or about June 15, 2016, at St. Thomas, in the District of the Virgin Islands, the defendant,

**THOMAS BITTER,**

did knowingly and willfully transmit in interstate commerce a communication containing a threat to injure the person of another, that is, defendant transmitted an email using his Yahoo account, to A.S., a Judicial Security Inspector, containing a threat to injure A.S., a Judicial Security Inspector.

In violation of Title 18, United States Code, Section 875(c).

U.S.A. v. Thomas Bitter  
Superseding Indictment  
Page 3

**THE GRAND JURY FURTHER CHARGES:**

**COUNT THREE**

On or about May 3, 2016, through on or about June 15, 2016, at St. Thomas, in the District of the Virgin Islands and elsewhere, the defendant,

**THOMAS BITTER,**

with the intent to harass, intimidate, and place under surveillance with intent to harass and intimidate another person, specifically Judicial Security Inspector A.J., used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to A.J.

In violation of Title 18, United States Code, Section 2261A(2)(B).

U.S.A. v. Thomas Bitter  
Superseding Indictment  
Page 4

The Grand Jury returned a TRUE BILL

RONALD W. SHARPE  
UNITED STATES ATTORNEY

By:   
\_\_\_\_\_  
EVERARD E. POTTER  
ASSISTANT UNITED STATES ATTORNEY

DISTRICT OF THE VIRGIN ISLANDS: September 8, 2016.

Returned into the District Court by Grand Jurors and filed.

  
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CURTIS V. GOMEZ  
UNITED STATES DISTRICT JUDGE

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